

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL  
LEAGUE PLAYERS' CONCUSSION  
INJURY LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

**Hon. Anita B. Brody**

Kevin Turner and Shawn Wooden,  
*on behalf of themselves and  
others similarly situated,*

Plaintiffs,

v.

Civ. Action No.: 14-00029-AB

National Football League and  
NFL Properties, LLC,  
successor-in-interest to  
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:  
ALL ACTIONS

**RESPONSE IN OPPOSITION OF CLASS COUNSEL THE LOCKS LAW FIRM TO  
THE NATIONAL FOOTBALL LEAGUE AND NFL PROPERTIES LLC'S MOTION  
FOR THE APPOINTMENT OF A SPECIAL INVESTIGATOR**

Class Counsel The Locks Law Firm respectfully submits this Response in Opposition to the National Football League and NFL Properties LLC's Motion ("NFL") for the Appointment of a Special Investigator.

Appointment of a Special Investigator to assist the Claims Administrator and the Court in investigating the submission of fraudulent claims to the NFL Concussion Settlement Program, as requested by the NFL, is unnecessary and would only serve to complicate existing procedures.

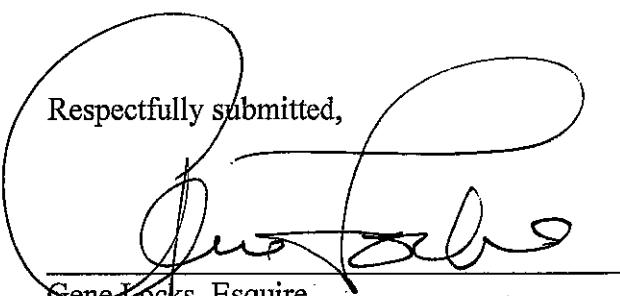
Thus far, BrownGreer has done an excellent job in investigating fraudulent and suspected fraudulent claims. To date, BrownGreer has already singled out over two hundred (200) fraudulent or suspect claims and continues to investigate and weed out such claims. BrownGreer has an effective investigation system in place and does not require further oversight or assistance.

Further, appointment of a Special Investigator would complicate existing procedures. In its brief Motion, the NFL has offered no practical suggestions regarding how the Special Investigator would function, including who the individual would take instruction from and report to, where he or she would work, and the extent of the individual's authority.

As such, Class Counsel The Locks Law Firm respectfully requests that the NFL's Motion be denied.

Respectfully submitted,

By:

  
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CLASS COUNSEL

**CERTIFICATE OF SERVICE**

I hereby certify that on this 27<sup>th</sup> day of April, 2018, I caused the foregoing Response in Opposition of Class Counsel to the National Football League and NFL Properties LLC's Motion for the Appointment of a Special Investigator, to be served via the Electronic Case Filing (ECF) system in the United States District Court for the Eastern District of Pennsylvania, on all parties registered for CM/ECF in the above-captioned matter.

By: *Isi Gene Locks*  
Gene Locks